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LETTER REGARDING REVIEW AND COMMENTS ON PROPOSED PLAN FOR SITE 45 NAS PENSACOLA FL
11/8/2011
U S EPA REGION IV

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
SAM NUNN ATLANTA FEDERAL CENTER
61 FORSYTH STREET, S.W.
ATLANTA, GEORGIA 30303

November 8, 2011

Official Correspondence – This electronic message is being sent in lieu of regular mail

4SF/FFB

Ms. Patty M. Whittemore
Remedial Project Manager
SOUTHNAVFACENGCOM
NAS Jacksonville Building 103
Jacksonville, FL 32212

Re: EPA Review of the OU 20, Site 45 Proposed Plan

Dear Ms, Whittemore:

The United States Environmental Protection Agency has received and reviewed the above referenced document. The EPA comments on the Proposed Plan for OU20 are provided below:

General Comments

1) EPA does not concur with the selected remedy for soils. The lead concentration once excavated would be considered a hazardous waste depending on the volume of soils that concentration represents within the surrounding soils. EPA's experience with land use controls would suggest that there is a potential in the future that site activities may expose those soils to workers. The potential for exposure exist during repaving, during Navy reuse of the site, and/or utility construction. EPA prefers to address the high lead contamination with this remedy by removing and disposing it in a more appropriate location. There is not a significant difference in costs for the two alternatives making the additional protectiveness more favorable.

2) EPA, at this time, cannot concur with the groundwater remedy as there would not appear to be sufficient information to select monitored natural attenuation as the remedy. After reviewing the RI and FS, EPA determined that a portion of the site (where lead and PAHs exceed industrial standards in soil) would not appear to have any groundwater wells in which to determine whether the groundwater has been affected by the site contaminants. It would also appear that the mechanism for determining the natural attenuation process has not been established. Though the existing concentrations of contaminants in the northern portion of the site are low, knowing whether they have reached a stable state of attenuation is important to understanding whether monitored natural attenuation will be effective in reaching the remedial goals. In addition, it is not clear whether the plumes are stable or migrating from the information in the RI and FS.

Specific Comments

1) The proposed plan should present a clear link between the Remedial Action Objectives (RAO), the exposure pathway/receptor (or resource protected), and the constituent specific response goal. The proposed plan should also include a clear presentation of the contaminants of concern and their locations in order to present a footprint of areas of contamination that are captured by the RAO.

2) There is need to mention the requirement to restore groundwater to beneficial use and include monitoring in the soils remedy to ensure that it remains protective of groundwater. In addition to monitoring it would be likely that the asphalt pavement would require additional funds for repairs of the pavement every 10-15 years. This would add additional cost to the remedy for soils. The proposed plan should also state the need for a five year review and whether this was considered in the costs for each remedy. The same should be included for land-use controls, if not already included in the cost. The groundwater monitoring would need to be included as long as the wastes remain in place.

3) Please include a discussion of ARARs for the remedy.

4) Page 3 mentions the former generating plant. Was this considered in the RI for its potential to contaminate the site?

5) Revise the response goal for lead to 800 mg/kg to meet EPA industrial standards for soil.

6) Page 8: Please ensure that the response goals address leachability and clarify why the response goals for both industrial and residential are presented.

7) Pg 8, Soil cleanup alternative: clearly articulate how the remedies address each of the RAO.

8) P9, please replace the words cover system with pavement cap to be more explicit. This will require full revision to some sentences that would be redundant.

9) Page 10: Please use the most conservative groundwater quality standard. The first paragraph suggests the use of both EPA and FDEP criteria. Please be specific regarding the water quality criteria to be used.

10) Alternative 3 suggests that groundwater contamination has not been delineated. This being the case, EPA would question the validity of the alternatives to address the contamination. This alternative must also be specific about the contingency to be implanted.

11) Pg 11, Long-term effectiveness manages the risks through LUCs. It doesn't reduce them.

12) Pg 11, Reduction of TMV would appear to include ex-situ treatment of soils removed for placement of the pavement.

13) The first paragraph under implementatibility is unclear.

14) The 30 year maintenance costs for alternative S-3 appear low considering some of these comments on long-term asphalt maintenance, groundwater monitoring, LUCs and 5 year reviews.

15) Overall protection again mentions contingency measures though these are not defined. Contingency measures need to be stipulated, costs evaluated, and presented for consideration by the public.

16) The costs under groundwater alternatives have maintenance costs that are different. Please explain.

17) Preferred Alternative does not use permanent solutions as stated in the sixth paragraph.

18) Please explain why the periodic costs are not included in Table 3.

Should any of the above comments require clarification, please contact me at 404-562-8510 or woolheater.tim@epa.gov.

Sincerely,

Tim Woolheater

Digitally signed by Tim Woolheater
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Timothy R. Woolheater
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Federal Facilities Branch

CC: Mr. David Grabka, FDEP